

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

CHARLES EDWARD STEED,	:	
on behalf of himself and all	:	
others similarly situated	:	CIVIL ACTION NO.
and	:	1:14-CV-00437-SCJ-ECS
AMY SUMMERS,	:	
on behalf of herself and all others	:	
similarly situated	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
EQUIFAX INFORMATION	:	
SERVICES, LLC	:	
	:	
Defendant.	:	
	:	

**PLAINTIFFS' CONSENT MOTION FOR EXTENSION  
OF DISCOVERY AND OTHER PRETRIAL DEADLINES**

Plaintiffs Charles Edward Steed and Amy Summers (“Plaintiffs”) move for an extension of the current discovery deadlines, and the scheduling of deadlines for the completion of factual and expert discovery, and the filing of dispositive and class certification motions.<sup>1</sup>

The parties have been actively engaged in written discovery and production of documents and have produced documents and written responses to each other,

<sup>1</sup> Counsel for Plaintiffs conferred with counsel for Defendant Equifax Information Services, LLC (“Defendant” or “Equifax”) who consents to the filing of this motion.

and have produced several supplemental responses. Plaintiffs Steed and Summers have both provided deposition testimony, and the deposition of one of Defendant's designated witnesses is set for June 16, 2015. Due to the complexity of the case, however, Defendant will need to designate at least two other witnesses to testify in response to Plaintiff's Notice of Deposition pursuant to Fed. R. Civ. P. 30(b)(6). Additionally, following the testimony by Defendant's corporate representatives, the parties will need to complete depositions of fact witnesses identified during the course of written discovery. Finally, some written discovery remains outstanding.

The parties believe that these depositions and the remaining written discovery cannot be completed under the existing schedule, are necessary, and will streamline the issues going forward and focus the subsequent motion practice appropriately.

The parties therefore respectfully request that the remaining case deadlines be extended by sixty (60) days with the new deadlines as follows:

<b>EVENT</b>	<b>DATE</b>
Completion of Factual Discovery	August 17, 2015
Completion of Expert Discovery	October 16, 2015
Filing of Dispositive Motions	November 16, 2015

Filing of Responses to Dispositive Motions	December 18, 2015
Filing of Replies to Dispositive Motions	January 18, 2016
Filing of Motion for Class Certification	November 16, 2015, to thirty days after ruling on dispositive motions

Dated: June 10, 2015

Respectfully Submitted,

s/ James M. Feagle

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been electronically filed with the clerk of the court using the CM/ECF system which will send notice of such filing to the following counsel:

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Dated this 10th day of June 2015.

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